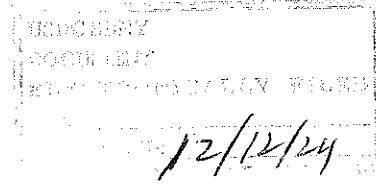


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States of America

v.

Midence Martinez Turcios,

*Defendant.*  
[Proposed] 3500 Protective Order

18 Cr. 499 (LAK)

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Jacob Gutwillig and David Robles, Assistant United States Attorneys, of counsel, for an order restricting the dissemination of material produced pursuant to 18 U.S.C. § 3500, *Giglio v. United States*, 405 U.S. 150 (1972), and the Government's general disclosure obligations ("3500 Material"), in connection with the *Fatico* hearing that is scheduled for December 12, 2024 in this matter (the "Hearing");

Whereas, (i) certain of the 3500 Material will contain sensitive information that impacts the safety of witnesses and members of their families; and (ii) Midence Martinez Turcios, by and through counsel, consents to the entry of this Order, the Court finds that there is good cause for the requested relief, IT IS HEREBY ORDERED that:

- (1) the defendant and his defense team shall not show or disseminate any of the 3500 Material to anyone other than the defendant, defense counsel, and any paralegal, staff, or investigator employed by the defense;
- (2) the defendant and his defense team shall not transport or transmit any of the 3500 Material outside the United States;
- (3) that the defendant shall not possess any of the 3500 Material, either before,

during, or after the Hearing, except when reviewing the 3500 Material in the presence of counsel, or any paralegal or staff employed by the defense;

(4) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the Hearing or when any appeal has become final; and

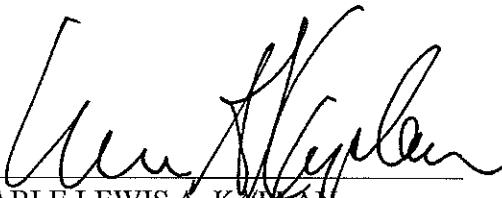
(5) defense counsel may seek authorization of the Court, with notice to the Government, to provide certain specified materials to persons whose access to such materials is otherwise prohibited by this Order, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

SO ORDERED:

Dated: New York, New York

November \_\_\_, 2024

Dec. 12



HONORABLE LEWIS A. KAPLAN  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK